

I get the impression from many of my small market colleagues that they take exception to the mandatory recording proposal because the cost burden (in equipment and manpower) would be greater for small market stations. While it is generally accepted that the equipment and manpower costs would be an even greater load on small market stations, I reject this as a market size issue which incinuates that larger stations can afford to absorb the cost. I believe this is a disciplinary issue that effects all stations, of all sizes. Without question, mandatory recording to would add a large cost to any station's operating cost. I think it is a fair to infer that adding any unwarranted costs penalizes a station. So, like all FCC policies, mandatory recording needs to be shown as a justifiable expence in order to be considered a course of action to take. I can't understand why a few high-profile cases of indecency justifies an across-the-board change in policy that would impact all stations.

One could argue that the proposed policy of mandatory and continuous recording and archiving of 1170 hours of programming would be a stiff, well-intentioned penalty for stations that have had complints filed against them with the FCC. (Untimately, I would argue that even this policy would be an administrative nightmare for not only the licencee, but the FCC as well). But to burden stations that have never had a complaint or violation is unjustifiable.

The FCC has always been a reactionary agency when it comes to matters of indecency. The Communications Act provides several options for filing complaints about telecommunications services. If you are intent on becoming pro-active when it comes to broadcast indecency, why not encourage consumers to utilize the process of filing a complaint already in place. Please do not burden innocent stations (large and small) with a policy that is punitive, unjustifiable and premature.

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